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RENALDO NAVARRO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RENALDO NAVARRO,

Plaintiff,

v.

MENZIES AVIATION INC., doing business
as MENZIES and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 3:19-CV-08157-VC

**PLAINTIFF RENALDO
NAVARRO'S INTERROGATORIES
TO DEFENDANT MENZIES
AVIATION, INC.,
SET ONE**

PROPOUNDING PARTY: Plaintiff RENALDO NAVARRO

RESPONDING PARTY: Defendant MENZIES AVIATION, INC.

SET NO.: ONE

Plaintiff Renaldo Navarro hereby requests that Defendant Menzies Aviation, Inc. respond to each of the following interrogatories set forth below under oath and within thirty (30) days of service, pursuant to Rule 33 of the Federal Rules of Civil Procedure.

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INTERROGATORIES

INTERROGATORY NO. 1.

State all of PLAINTIFF's job titles during his employment with YOU.

(As used in this Interrogatory, the following words, when used in all capitals, shall have the following meanings:

"PLAINTIFF" shall refer to Plaintiff Renaldo Navarro.

"YOU" and "YOUR" refer to Defendant Menzies Aviation, Inc., and/or to any of its past or present officers, directors, employees and/or agents, and/or all of its divisions, subsidiaries, affiliated or related or predecessor companies.)

INTERROGATORY NO. 2.

State all of PLAINTIFF's job duties during the RELEVANT PERIOD.

(As used in this Interrogatory, the following word, when used in all capitals, shall have the following meaning:

"RELEVANT PERIOD" shall refer to the past five (5) years until PLAINTIFF's termination of employment in or around August 29, 2018.)

INTERROGATORY NO. 3.

IDENTIFY PLAINTIFF's supervisors during the RELEVANT PERIOD.

(As used in this Interrogatory, the following word, when used in all capitals, shall have the following meaning:

"IDENTIFY," when used in reference to a natural PERSON, shall mean to state such person's full name, last-known home and business address, last-known business affiliation, employer, and position therewith, and the latest date that such information was true, to YOUR knowledge; when used in reference to a business, firm, partnership, joint venture, company or corporation, shall mean to state, to the extent known, its full name, state of incorporation or creation, address of its principal place of business, and its principal activities or products; when referring to a lawsuit or other legal proceeding, shall mean to state the court of jurisdiction, venue, case number, case title, attorneys of record, and filing date; when used in reference to DOCUMENTS , shall mean to describe specifically the document, including a description of its

1 type (e.g., letter, memorandum, telegram, chart, etc.), and to state its date, author, addressee,
2 title, file identification number or symbol, and to identify the present location and the name and
3 address of the present custodian of such document. If any such DOCUMENTS is no longer in
4 YOUR possession or subject to YOUR control, state what disposition was made of it and the
5 date of such disposition, identifying the PERSON having knowledge of its content.)

6 **INTERROGATORY NO. 4.**

7 IDENTIFY YOUR supervisors who worked the swing shifts before PLAINTIFF's shift
8 during the RELEVANT PERIOD.

9 **INTERROGATORY NO. 5.**

10 State the job duties of YOUR supervisors who worked the swing shifts before
11 PLAINTIFF's shift during the RELEVANT PERIOD.

12 **INTERROGATORY NO. 6.**

13 State YOUR policy on DISCIPLINARY ACTIONS during the RELEVANT PERIOD
14 whenever YOUR swing supervisors did not perform their respective job duties.

15 "DISCIPLINARY ACTIONS" shall mean any form of warnings, reprimands or
16 suspensions related to non-compliance with the employer's company policies, and work-related
17 performance that fails to satisfactorily meet job requirements as set forth in the relevant job
18 description, work action plan, or as directed by an employee's supervisor.)

19 **INTERROGATORY NO. 7.**

20 State DODGE's tasks in a WORKDAY during the RELEVANT PERIOD.

21 (As used in this Interrogatory, the following words, when used in all capitals, shall have
22 the following meanings:

23 "DODGE" shall refer to YOUR employee, Andrew Dodge.)

24 **INTERROGATORY NO. 8.**

25 State all complaints that PLAINTIFF made to YOU regarding DODGE during the
26 RELEVANT PERIOD.

27 **INTERROGATORY NO. 9.**

28 IDENTIFY all PERSONS who have knowledge of the complaints that PLAINTIFF

1 made to YOU regarding DODGE during the RELEVANT PERIOD.

2 (As used in this Interrogatory, the following word, when used in all capitals, shall have
3 the following meaning:

4 “PERSON(S)” means any natural person, together with all federal, state, county,
5 municipal and other government units, agencies or public bodies, as well as firms, companies,
6 corporations, partnerships, proprietorships, joint ventures, organizations, groups of natural
7 persons or other associations or entities separately identifiable whether or not such associations
8 or entities have a separate legal existence in their own right.)

9 **INTERROGATORY NO. 10.**

10 State all facts regarding each INVESTIGATION related to PLAINTIFF’s complaints to
11 YOU regarding DODGE’s work during the RELEVANT PERIOD.

12 (As used in this Interrogatory, the following word, when used in all capitals, shall have
13 the following meaning:

14 “INVESTIGATION” shall mean to include the facts relating to the receipt/intake of
15 complaints by any of YOUR employees, YOUR efforts to investigate the complaints, any
16 findings or determination made by YOU with respect to the complaints and actions taken by
17 YOU in response to YOUR findings or determinations.)

18 **INTERROGATORY NO. 11.**

19 IDENTIFY all PERSONS who have knowledge of the facts regarding each
20 INVESTIGATION related to PLAINTIFF’s complaints to YOU regarding DODGE’s work
21 during the RELEVANT PERIOD.

22 **INTERROGATORY NO. 12.**

23 State all complaints made to YOU by any of your present or former employees about
24 DODGE’s work during the RELEVANT PERIOD.

25 **INTERROGATORY NO. 13.**

26 IDENTIFY all PERSONS who have knowledge of the complaints made to YOU by any
27 of your present or former employees about DODGE’s work during the RELEVANT PERIOD.

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1 **INTERROGATORY NO. 14.**

2 State all facts regarding each INVESTIGATION YOU conducted related to the
3 complaints made to YOU by any of your present or former employees about DODGE's work
4 during the RELEVANT PERIOD.

5 **INTERROGATORY NO. 15.**

6 IDENTIFY all PERSONS who have knowledge of the facts regarding each
7 INVESTIGATION YOU conducted related to the complaints made to YOU by any of your
8 present or former employees about DODGE's work.

9 **INTERROGATORY NO. 16.**

10 State all DISCIPLINARY ACTIONS taken by YOU against DODGE during his
11 employment with YOU.

12 **INTERROGATORY NO. 17.**

13 Describe YOUR Code of Conduct that applied to PLAINTIFF during the RELEVANT
14 PERIOD.

15 **INTERROGATORY NO. 18.**

16 State YOUR policy on imposing DISCIPLINARY ACTIONS on YOUR employees for
17 signing a petition to make a complaint during the RELEVANT PERIOD.

18 **INTERROGATORY NO. 19.**

19 State YOUR policy on suspension of employment during the RELEVANT PERIOD.

20 **INTERROGATORY NO. 20.**

21 State YOUR basis for suspending PLAINTIFF's employment in or around August 23,
22 2018.

23 **INTERROGATORY NO. 21.**

24 IDENTIFY all individuals involved in the determination to suspend PLAINTIFF.

25 **INTERROGATORY NO. 22.**

26 State YOUR policy on termination of employment during the RELEVANT PERIOD.

27 **INTERROGATORY NO. 23.**

28 IDENTIFY all individuals involved in the determination to terminate PLAINTIFF.

INTERROGATORY NO. 24.

State the specific violation in the Code of Conduct that was YOUR reason for terminating PLAINTIFF's employment.

INTERROGATORY NO. 25.

List all DOCUMENTS related to PLAINTIFF that YOU DESTROYED.

(As used in this Interrogatory, the following word, when used in all capitals, shall have the following meaning:

"DESTROYED" shall mean an act that renders the subject useless for its intended purpose, though it does not literally demolish or annihilate it, which includes cancellation, obliterating, shredding, burning, and tearing into fragments; deletion of data stored on tapes, hard disks and other forms of electronic media.)

Dated: July 14, 2020

LIBERATION LAW GROUP, P.C.



By: _____

Arlo Garcia Uriarte
Attorneys for Plaintiff